

Meredith Martin Addy (pro hac vice)  
ADDYHART P.C.  
10 Glenlake Parkway, Suite 130  
Atlanta, GA 30328  
312.320.4200  
meredith@addyhart.com

Paul N. Tauger (SBN 160552)  
ADDYHART P.C.  
5151 California Street, Suite 100  
Irvine, CA 92617  
949.438.3218  
949.438.3332 (fax)  
ptauger@addyhart.com

Robert P. Hart (pro hac vice)  
Brandon C. Helms (pro hac vice)  
ADDYHART P.C.  
401 N. Michigan Ave., Suite 1200-1  
Chicago, Illinois 60611  
949.337.0568  
robert@addyhart.com  
312.731.6568  
bhelms@addyhart.com

*Attorneys for Involuntary Plaintiff Thales Visionix, Inc*

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

GENTEX CORPORATION and INDIGO  
TECHNOLOGIES, LLC,

Plaintiffs,

THALES VISIONIX, INC.,

Involuntary Plaintiff,

v.

META PLATFORMS, INC., and META  
PLATFORM TECHNOLOGIES, LLC,

Defendants.

Case No.: 4:22-cv-03892-YGR

DECLARATION OF ROBERT HART IN  
SUPPORT OF MOTION FOR LEAVE TO  
FILE SUR-REPLY TO JOINT MOTION TO  
DISMISS

Date: February 27, 2024

Time: 2:00 p.m.

Location: Courtroom 1, 4th Floor

Judge: Hon. Yvonne Gonzalez Rogers

1 I, Robert Hart, declare as follows:

2 1. I am counsel with the law firm ADDYHART P.C., counsel of record for Involuntary  
3 Plaintiff Thales Visionix, Inc. (Thales). I make this declaration in support of Thales's Motion for  
4 Leave to File Sur-Reply to the Joint Motion to Dismiss.

5 2. On February 13, 2024, I sent an email to counsel for Plaintiffs Gentex Corporation and  
6 Indigo Technologies, and Defendants META Platforms, Inc. and META Platform Technologies,  
7 LLC. asking whether Plaintiffs and Defendants would oppose or not oppose Thales filing a Sur-  
8 Reply. Also on February 13, 2024, I received an email from Adam Harber at Williams & Connolly  
9 LLP stating that both Gentex/Indigo and Meta object.

10 3. Attached as **Exhibit A** is a true and correct copy of Thales's proposed Sur-Reply.

11 I declare under penalty of perjury under the laws of the United States of America that the  
12 foregoing is true and correct.  
13

14 This 14<sup>th</sup> day of February 2024.

Respectfully submitted,

16 /s/ Robert P. Hart

17 Robert P. Hart (pro hac vice)  
18 Brandon C. Helms (pro hac vice)  
19 ADDYHART P.C.  
20 401 N. Michigan Ave., Suite 1200-1  
21 Chicago, Illinois 60611  
22 949.337.0568  
23 robert@addyhart.com  
24 312.731.6568  
25 bhelms@addyhart.com

26 Paul N. Tauger (SBN 160552)  
27 ADDYHART P.C  
28 5151 California Street, Suite 100  
Irvine, CA 92617  
949.438.3218  
949.438.3332 (fax)  
ptauger@addyhart.com

Meredith Martin Addy (*pro hac vice*)  
ADDYHART P.C  
10 Glenlake Parkway, Suite 130  
Atlanta, GA 30328  
312.320.4200  
meredith@addyhart.com

***Counsel for Involuntary Plaintiff  
Thales Visionix, Inc.***

**SIGNATURE ATTESTATION**

Pursuant to Local Rule 5-1(i)(3), I hereby attest that concurrence in the filing of this document has been obtained from the other signatories.

Dated: February 14, 2024

*/s/ Robert P. Hart*  
Robert P. Hart